

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

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**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION OF  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS  
SPECIAL INSURANCE COUNSEL FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR THE PERIOD OF  
APRIL 1, 2023 THROUGH APRIL 30, 2023**

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Pursuant to the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [ECF No. 117] (the "Interim Compensation Order"), Burns Bair LLP, special insurance counsel for the Official Committee of Unsecured Creditors (the "Committee"), hereby files this monthly fee statement (the "Monthly Fee Statement") seeking compensation for reasonable and necessary services rendered to the Committee from April 1, 2023 through April 30, 2023 (the "Compensation Period") in the amount of \$20,872.00 (80% of \$26,090.00) and reimbursement of actual and necessary expenses incurred during the Compensation Period in the amount of \$1,967.79.

Burns Bair LLP's invoice for the Compensation Period, attached hereto as **Exhibit A**, includes a description of expenses Burns Bair LLP incurred during the Compensation Period in connection with providing services to the Committee.

[Signature page follows]

Date: May 31, 2023

/s/ Timothy W. Burns

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Timothy W. Burns (WI State Bar #1068086)

Jesse J. Bair (WI State Bar #1083779)

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*Special Insurance Counsel for the Official  
Committee of Unsecured Creditors*

# EXHIBIT A

## Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 5/5/2023

**Bill # :** 01145

**Matter:** Insurance

### PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/3/2023	Jesse Bair	Analyze latest version of insurer exposure analysis in preparation for call with Claro (.2); preliminary review of adult claims filed to date (.1); participate in call with Claro re revised insurer exposure analysis to account for new adult claims (.2);	0.50	\$312.50
4/4/2023	Timothy Burns	Conference with J. Bair re case insurance strategy (.2);	0.20	\$140.00
4/4/2023	Jesse Bair	Review Diocese notice of voluntary dismissal re certain parish insurers (.1); correspondence with R. Kulger re same (.1);	0.20	\$125.00
4/4/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.2);	0.20	\$125.00
4/7/2023	Timothy Burns	Participate in call with state court counsel re insurance and mediation strategy (.2); participate in conference with J. Bair re same (.1);	0.30	\$210.00
4/7/2023	Jesse Bair	Preliminary review of Claro analysis re Adult Abuse Claims and insurer exposure (.2); correspondence with Claro re additional changes needed in connection with same (.1);	0.30	\$187.50
4/7/2023	Jesse Bair	Conference with T. Burns re insurance strategy issues (.1);	0.10	\$62.50
4/7/2023	Jesse Bair	Correspondence with N. Kuenzi re additional analysis needed of adult abuse claims re insurer exposures (.1);	0.10	\$62.50
4/10/2023	Jesse Bair	Participate in call with Stinson and T. Burns re Plan and insurance strategy (.8); follow-up conference with T. Burns re same and next-steps .2);	1.00	\$625.00
4/10/2023	Jesse Bair	Review L. Kugler correspondence re upcoming Committee meeting and mediation session (.1);	0.10	\$62.50
4/10/2023	Timothy Burns	Participate in call with Stinson and J. Bair re Plan and insurance issues (.8); participate in follow-up conference with J. Bair re same and next-steps (.2);	1.00	\$700.00

4/11/2023	Timothy Burns	Analysis of Plan insurance options and settlement strategies (1.2); call with R. Kugler re same (.4); met with J. Bair re same (.4); work re logistics of mediation (.3);	2.30	\$1,610.00
4/11/2023	Jesse Bair	Participate in conference with T. Burns re Plan insurance options and potential settlement strategies (.4); follow-up correspondence with T. Burns re same and additional case law analysis (.1);	0.50	\$312.50
4/12/2023	Jesse Bair	Participate in conference with T. Burns re consideration of insurance resolution strategy (.1); begin analyzing T. Burns PowerPoint presentation re same (.2);	0.30	\$187.50
4/12/2023	Timothy Burns	Consideration of insurance resolution strategy (.4); call with R. Kugler re same (.1); met with J. Bair re same (.1); prepare PowerPoint re same (.8); email to J. Bair re PowerPoint and meeting re strategy (.1);	1.50	\$1,050.00
4/13/2023	Timothy Burns	Participate in conference with Stinson team and J. Bair re insurance case strategy (.6); participate in post-conference meeting with J. Bair re same and potential next-steps (.1);	0.70	\$490.00
4/13/2023	Jesse Bair	Participate in conference with Stinson team and T. Burns re insurance case strategy (.6); participate in post-conference meeting with T. Burns re same and potential next-steps (.1);	0.70	\$437.50
4/13/2023	Jesse Bair	Review and edit T. Burns PowerPoint presentation re case insurance strategy (.4);	0.40	\$250.00
4/14/2023	Alyssa Turgeon	Create Syracuse mediation prep binder for T. Burns (.5);	0.50	\$180.00
4/14/2023	Jesse Bair	Prepare for Committee and state court counsel meeting (.1); participate in state court counsel and Committee meeting re meditation strategy for insurance purposes (.9);	1.00	\$625.00
4/14/2023	Jesse Bair	Review updated Claro analysis re revised insurer exposure incorporating adult claims (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Revise insurance overview chart (.1); draft insurance omnibus summary in preparation for upcoming mediation (.3);	0.40	\$250.00
4/14/2023	Nathan Kuenzi	Analyze recently filed adult proofs of claim and assess potential coverage for same (.6);	0.60	\$252.00
4/14/2023	Nathan Kuenzi	Draft summary of potential coverage implicated by adult proofs of claim for J. Bair (.4);	0.40	\$168.00
4/14/2023	Timothy Burns	Participate in state court counsel and Committee meeting re meditation strategy for insurance purposes (.9);	0.90	\$630.00
4/16/2023	Timothy Burns	Reviewed research memo and PowerPoint re potential avenues of recovery against insurers in bankruptcy (.6);	0.60	\$420.00
4/17/2023	Timothy Burns	Travel from Madison to Syracuse for mediation [billed at 1/2 travel rate] (7.9);	7.90	\$2,765.00
4/18/2023	Timothy Burns	Participate in day 1 of mediation session (8.3);	8.30	\$5,810.00
4/19/2023	Timothy Burns	Participate in day 2 of mediation session (5.5);	5.50	\$3,850.00

4/19/2023	Timothy Burns	Return travel to Madison from mediation [billed at 1/2 travel rate] (.6);	6.60	\$2,310.00
4/19/2023	Jesse Bair	Review and respond to correspondence with T. Burns re settlement status and mediation session outcome (.2);	0.20	\$125.00
4/20/2023	Timothy Burns	Participate in call with J. Bair re settlement status and developments (.1);	0.10	\$70.00
4/20/2023	Jesse Bair	Participate in call with T. Burns re settlement status and developments (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Analyze the mediator's proposal (.1); review correspondence with R. Kugler and state court counsel re same (.1);	0.20	\$125.00
4/22/2023	Jesse Bair	Review correspondence with state court counsel re mediator's proposal (.1);	0.10	\$62.50
4/25/2023	Timothy Burns	Participate in meeting with state court counsel, the Committee, and Stinson for insurance purposes re mediator's proposal and case next-steps (.6);	0.60	\$420.00
4/25/2023	Jesse Bair	Prepare for state court counsel and Committee meeting (.1); participate in meeting with state court counsel, the Committee, and Stinson for insurance purposes re mediator's proposal and case next-steps (.6);	0.70	\$437.50
4/25/2023	Jesse Bair	Review R. Kugler and state court counsel correspondence re insurer prompt payment requirements (.1);	0.10	\$62.50
4/26/2023	Jesse Bair	Review correspondence from the mediator re acceptance of the mediator's proposal (.1);	0.10	\$62.50
4/26/2023	Timothy Burns	Review correspondence with mediator re acceptance of mediator's proposal (.1);	0.10	\$70.00
4/27/2023	Jesse Bair	Participate in conference with T. Burns re next-steps re case insurance strategy (.1);	0.10	\$62.50
4/27/2023	Timothy Burns	Participate in conference with J. Bair re next-steps re case insurance strategy (.1);	0.10	\$70.00
4/28/2023	Jesse Bair	Correspondence with B. Horn re preparation of BB's fourth interim fee application (.1);	0.10	\$62.50
4/29/2023	Jesse Bair	Review correspondence from the mediator re upcoming insurance mediation session (.1);	0.10	\$62.50
4/30/2023	Jesse Bair	Correspondence with T. Burns re upcoming insurance mediation session (.1);	0.10	\$62.50
<b>Total Hours and Fees</b>			<b>46.00</b>	<b>\$26,090.00</b>

**EXPENSES**

<b><u>Date</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
4/1/2023	First Quarter 2023 PACER (Public Access to Court Electronic Records)	\$80.90
4/17/2023	Delta Airlines, T. Burns (MSN-SYR April 17)	\$748.20
4/17/2023	Uber, T. Burns (airport to hotel)	\$32.73
4/17/2023	Hotel, T. Burns (2 nights)	\$509.60

4/17/2023	Travel meal, T. Burns	\$6.01
4/18/2023	Travel meal, T. Burns	\$6.01
4/19/2023	Travel meal, T. Burns	\$18.26
4/19/2023	Travel meal, T. Burns	\$4.63
4/19/2023	Travel meal, T. Burns	\$18.78
4/19/2023	Travel meal, T. Burns	\$4.00
4/19/2023	Uber, T. Burns (mediation to airport)	\$34.47
4/19/2023	United Airlines, T. Burns (SYR-MSN April 19)	\$504.20
<b>Total Expenses</b>		<b>\$1,967.79</b>

**Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Alyssa Turgeon	0.50	\$360.00	\$180.00
Jesse Bair	7.80	\$625.00	\$4,875.00
Nathan Kuenzi	1.00	\$420.00	\$420.00
Timothy Burns	14.50	\$350.00	\$5,075.00
Timothy Burns	22.20	\$700.00	\$15,540.00

**Total Due This Invoice: \$28,057.79**

**CERTIFICATE OF SERVICE**

I, Jessica Rehbein, hereby certify that on May 31, 2023, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF and that service was emailed to the following parties:

- a. The Roman Catholic Diocese of Syracuse, New York, 240 East Onondaga Street,  
Syracuse, New York 13202
- b. Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202,  
Attn: Stephen A. Donato
- c. Office of the United States Trustee, 10 Broad Street, Room 105, Utica, New York  
13501, Attn: Erin P. Champion

Date: May 31, 2023

/s/ Jessica Rehbein

Jessica Rehbein